

Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

In the Matter of

Petition for a Microstation Radio

Broadcasting Service

Proposal for Creation of the Low Power FM (LPFM) Broadcast Service

RM

No.9208

RM

No.9242

COMMENTS OF KZUL-FM Lake Havasu City, AZ

KZUL-FM

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Christopher P. Rolando President / General Manager

Dear Friends in Broadcasting:

I am writing today in regard to the proposed rulemaking and the possibility of new low-power FM service. To set the scene, I am a small market broadcaster. Now for many people I have talked to about this issue, the term small market broadcaster is a fuzzy one. So I'd like to start here so you have a frame of reference for my comments.

I consider a small market broadcaster to be stations outside of the top 100 markets. We are talking about stations in places where populations can range from 2000 people up to about 50,000 people. Of the 12,000 or so radio stations on the air right now, the small market broadcaster makes up the majority of radio station ownership.

In our small markets you will find the broadcasters, and they are easily recognizable. They are on the boards of the Chamber of Commerce, The Partnership for Economic Development, The United Way and in general a part of everything that goes on in a small town. The reason is simple... because they want to serve the community they are in.

A small market broadcaster is not a rich man. When these huge consolidation deals came along, they did not put millions of dollars into the pockets of broadcasters in small markets. The deals affected broadcasting in large and medium markets. But back in the small markets of this country, the small market broadcaster spends his week getting the news out, keeping his equipment in compliance, running public service and public affairs programming, trying to find employees and making payroll. He may make a good wage, but he is no millionaire.

We have not yet seen the full engineering on the proposal for low power FM service. But here is where my concern lies. When looking at markets 1 through 5 (which more than likely have more population than all of the small markets combined) I see that only a handful of stations are possible. But when I look down to a place closer to home like Flagstaff Arizona, I see the

possibility of up to 25 1KW stations and 65 100 Watt stations in that city. With my city being far smaller and far more rural I can only wonder what the engineering will bring here.

This brings me to the crux of my thoughts. I know that the last thing people want to read from a broadcaster concerning this matter is about the economics. In my small town we do a lot for our community, and most small market broadcasters do. The majority of us go above and beyond what could reasonably be expected of any small business. The people looking to start LPFM's are looking for a way to make money. Therefore they will need to sell commercial time. With microstations gathering small audiences, the advertising has a chance of being less effective, thus turning advertisers off to radio as an advertising medium. When this happens, we as small market broadcasters are in a situation where we must cut our expenses in order to make ends meet. The areas that will get cut first in any business are the areas that are considered non-essential, and this would seriously curtail what a small market broadcaster could do for and with his community.

I agree that there is a need for access to the spectrum. I would like to take you back to cable TV where there is a mandated community access channel. In the community I lived in when this came out, there was a waiting list to get on the channel. Everyone wanted a TV show. The most popular show was a show done by a local political pundit who did his call in show from an old bath tub. But as the years wore on there was less and less interest in community access. Many had tried it and the novelty wore off. What we were left with were a few good shows, and a lot of time looking at a character generator.

I would like to propose a community access radio station be licensed in communities. I propose it be set up along the same lines as community access television on cable with enhanced underwriting available to it along the lines of that enjoyed by Public Radio. While this would not give everyone who wants access exactly what they want, it would give them a forum and that is what these proposals are all about. It would make it easy on the FCC to take care of compliance issues, licensing, EAS and fee structure while still giving the would be broadcasters a place to try out their ideas.

I work in a market with broadcasters who are good business people, but most of all good neighbors. The small market broadcaster is a person who does great things to help a community. I don't want to see this disappear. I know that the staff of the FCC is busy, working under tremendous economic and time constraints. But I am inviting the staff to come to the small markets and see what small market radio is about. I'd like to have you walk the street of my small town of Lake Havasu City Arizona and ask people here about what the radio stations have done for the town.

Respectfully submitted
KZUL-FM

Chris Rolando
President / General Manager